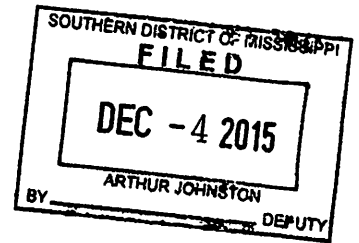


IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION



JEANETTE D. BROWN

PLAINTIFF

VS

CIVIL ACTION NO. 3:cv825-HTW-LRA

CITY OF JACKSON (MUNICIPALITY)  
TONY YARBER, MAYOR OF JACKSON  
MARTHA JONES-MURRELL  
VENECCA GREEN-MASON, ATTORNEY  
LAKEISHA HEIDELBERG  
ROSEMARY HARPER  
RICKY WILLIAMS  
OFFICER TRAVELL R. ALLEN, (JPD)  
HINDS COUNTY MUNICIPAL COURT SERVICE  
JOHNNIE MCDANIEL, PROSECUTOR

DEFENDANT(S)

JURY TRIAL DEMANDED

AMENDED COMPLAINT

COMES NOW, Plaintiff, Jeanette Brown, pro se, and files her Amended Complaint for cause of action against the defendant(s), to be sued in their personal and official capacity as named as City of Jackson (Municipality), Tony Yarber (Mayor of Jackson), Martha Jones-Murrell, Venecca Green-Mason (Attorney), Lakeisha Heidelberg, Rosemary Harper, Ricky Williams, Officer Travell R. Allen (JPD), Hinds County Municipal Court, Johnnie McDaniel (Deputy Prosecutor), would state:

1.

The City of Jackson, et al has denied Plaintiff, Jeanette Brown, a citizen of the State of Mississippi, the rights to life, liberty, and the pursuit of happiness, which is a direct violation of the Constitutional First Amendment, et al. The City of Jackson, exhibits directed abuse of power through false arrest of Plaintiff, by making intentional and malicious defamatory and

slanderous false statements, use of excessive force, criminal trespass, threats, obstruction of justice, common practice of openly assisting in criminal conspiracy to injure Plaintiff by denials to speedy right to trial, Constitutional rights to defend and confront accusers, through elimination of evidence provided of Plaintiff's innocence, and costly mediations for same causes, in efforts to afford defendants, City of Jackson, Martha Murrell, Lakeisha Heidelberg, Rosemary Harper, Ricky Williams, Johnnie Mc Daniel, Venecca Mason, and Officer Travell Allen, opportunity to prejudice the court by insertions of facts beyond a defensible requirement that be made for such charges deemed as criminal against the Plaintiff.

2.

Plaintiff, Jeanette Brown, asserts the denial of protection from criminal, fraudulent acts, and no relief is afforded from violations of Protective and Restrictive Covenants at her residence in the County and Chancery Courts of Jackson, Mississippi. Statutory land plats recorded and preserved as a prescribed land use as benefit for the Plaintiff is denied with willful negligence and lack of due care. The rights of citizens in the Jackson Municipality are egregiously disregarded and consistently ignored as would be expected as liberties afforded through the First, Fourth, Fifth, Fourteenth, and Sixteenth Amendments provided in the Constitution of the United States of America.

3.

Plaintiff, Jeanette Brown, asserts reckless and negligence of due care for upholding rights of its citizens by the City of Jackson and through officiates. Plaintiff, in this complaint and civil action protest the joined conspiracy of Jackson officiates in denying her justice, in enabling continual persecution and prosecution, and supports unwarranted and without merit, charges that slander, defame, and cast dispersion of character of citizens of the United States of

America.

### JURISDICTION

Jurisdiction and venue are proper in that the cause-of-action occurred and accrued in United States District Court Southern District of Mississippi. This court has subject matter jurisdiction pursuant to (a) 28 U.S.C. 1331, as this case arises under the Constitution Rights and Laws of the United States; (b) 28 U.S.C. 1343, because this action seeks redress and damages for violations of 42 U.S.C. 1983 and 1985, in particular, the due process and equal protection provisions of the United States Constitution, including the rights protected through the Fourth, Fifth, Fourteenth, and Sixteenth Amendments, et al and others thereof; and (c) 28 U.S.C. 1332 and since this is a cost, a sum in a civil action involving exclusive of interest causes of action in excess of \$50,000.00.

#### I.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, the City of Jackson, is a Governmental Municipality within the State of Mississippi. The City of Jackson is a recipient of Federal Funds and is responsible for overseeing and providing services to its citizens that are disadvantaged and poor.

#### II.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Martha Jones Murrell, is an adult resident citizen of the County of Hinds, State of Mississippi.

#### III.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of

Mississippi. The Defendant, Venecca Green-Mason, Attorney is an adult resident citizen of the County of Hinds, State Of Mississippi.

IV.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Lakeisha Heidelberg is an adult resident citizen of the County of Hinds, State of Mississippi.

V.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Rosemary Harper (JPD) is an adult resident citizen of the County of Hinds, State of Mississippi.

VI.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Ricky Williams is an adult resident of the County of Hinds, State of Mississippi.

VII.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Officer Travell R. Allen (JPD) is an adult resident citizen of the County of Hinds, State of Mississippi.

VIII.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Johnnie McDaniel (Senior Prosecutor Municipal Court) is an adult resident citizen of the County of Hinds, State of Mississippi.

IX.

Plaintiff, Jeanette Brown is an adult resident citizen of the County of Hinds, State of Mississippi. The Defendant, Tony Yarber (Mayor), is an adult resident citizen of the County of Hinds, State of Mississippi.

FACTS

1.

On May 24, 2011, the Hinds County Court, First Judicial District, Jackson, Mississippi entered and Amended Order of Dismissal with prejudice in favor of the Plaintiff herein, Defendant, Lakeisha Heidelberg allegedly perjured herself by making false police reports causing Jackson's Police to arrest Plaintiff and further a lengthy process to absolve her innocence. The defendant's action deprives and prohibits Plaintiff in having obtaining equal justice. This is a violation of the Fourth, Fifth, Eighth, Fourteenth, and Sixteenth Amendments and others, Exhibit A is attached to buffer Plaintiff's case.

2.

Beginning late in 2011, Defendant, Martha Jones Murrell, joined Lakeisha Heidelberg in conspiracy to effect a negative outcome in court by committing perjury, the actions are malicious to prosecute the Plaintiff for no good cause. Heidelberg's efforts were flawed, and dismissed. Plaintiff, initiated lawsuit in Justice Court for damages against Heidelberg. On July 28, 2011, trial was held whereas Heidelberg brings Murrell as witness to defame and slander Plaintiff Jeanette Brown, This is a violation Plaintiff's 4<sup>th</sup>, 5<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments and others. Plaintiff's complaint was dismissed against Heidelberg for damage award. Exhibit is in the hands of the Defendant.

3.

On July 28, 2011, Murrell files charges against Plaintiff alleging she was threatened by Plaintiff after leaving hearing in Justice Court herein, Exhibit D. On July 29, 2011, the defendant, Martha Murrell, files for peace bond against Plaintiff for same cause herein, Exhibit D. The defendant's actions caused undue stress and pain that has adverse effect on her and has prohibited the Plaintiff from liberties afforded by the 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments and others. In May 2013, these charges were dismissed against Plaintiff Jeanette Brown. Exhibit D is provided to buffer the Plaintiff's position.

4.

On February 9, 2012, Defendant Murrell harasses Plaintiff by filing another false charge against the Plaintiff alleging the crime of taking a picture and making threats. Exhibit E is provided to the court to view. The charge against Plaintiff was dismissed on May 2013. This is a violation of the 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments and others.

5.

On April 13, 2012, defendant Murrell files another false charge through slander and defamation of character against Plaintiff alleging fear of a black object that was unidentifiable and reported as a possible firearm herein, Exhibit F. The charge was dismissed in May 2013. The charge against the Plaintiff is unfounded and violates the Plaintiff's civil rights. This is a violation of the 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments and others, herein Exhibit provided.

6.

On April 24, 2012, defendant Murrell files charge against Plaintiff alleging fear from an

unidentifiable black object herein, Exhibit G. The charge was dismissed in May 2013. This is a violation of the 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments, and others.

7.

On June 8, 2013, Defendant Martha Murrell files charge against Plaintiff alleging Plaintiff held a black object above her head. Plaintiff was arrested and held in JPD holding cell for 6 hours before release was obtained. Plaintiff obtains cuts and injuries from being handcuffed and chained. The defendant, Martha Murrell was recorded on Plaintiff's cell phone (black) as carrying a concealed gun and made threats before JPD Officer Lampley to shoot Plaintiff. Murrells' affidavit against Plaintiff does not mention these facts herein, Exhibit H.

The recorded details are submitted in Municipal Court and Prosecutor Johnnie McDaniel has acknowledged viewing the tape. On November 11, 2015, the tape was reported as missing for trial set to dispose of the case. This case was postponed by prosecutor until February 2016 to allow Officer Lampley to witness. Plaintiff has received no relief from this prosecution despite evidence given of incident that vindicates Plaintiff of crime reported.

8.

On November 14<sup>th</sup>, 2014, the Office of the District Attorney, Seventh Circuit Court District, the July Hinds County Grand Jury, in reference to the JPD Case 2014-050882, was NO BILLED for charge of Malicious Mischief (felony) against Plaintiff herein, Exhibit I.

9.

Prior to November 14, 2014, Defendants, Martha Murrell, Venecca Mason (Murrell's attorney, and relative), City of Jackson's Senior Deputy Prosecutor Johnnie McDaniel, Rosemary Harper (provided as witness for Murrell by City of Jackson Prosecutor Johnnie McDaniel), and Lakeisha Heidelberg (provided as witness for Murrell by City of Jackson

Prosecutor Johnnie McDaniel), Ricky Williams (provided as witness for Murrell by City of Jackson Prosecutor Johnnie McDaniel), and Officer Travell R. Allen (provided as witness for Murrell by City of Jackson Prosecutor Johnnie McDaniel) that works for the City of Jackson and Mayor Tony Yarber and allegedly is in conspiracy of the wanton and malicious intent instituted through groundless proceedings against Plaintiff for arrest and charges of malicious mischief (felony), herein, Exhibit J. Plaintiff is arrested at her home and held for 10 hours in holding facility. Plaintiff's bond was \$5,000 as requested by Prosecutor Johnnie McDaniel, subsequently reduced to \$2,500.00 by Judge.

10.

On March 24, 2014, the Defendant, Venecca Green Mason, acting in professional scope of duties as representative for Martha Murrell in civil action case in Chancery Court, communicates to Plaintiff's Attorney, John R. Reeves, defamatory and malicious information in libel accountings of Plaintiff and threatens to further defame Plaintiff via media before a greater public herein Exhibit K.

11.

On December 3, 2014, in the Chancery Court of the First Judicial District of Hinds County, Mississippi, Defendants, Venecca Green Mason and Martha Murrell provide sworn testimony before Chancellor Singletary with accounts against Plaintiff of malicious mischief. Attorney Venecca Mason's direct of Martha Murrell in Chancery Court deviates and contradicts accountings rendered by both defendants, Murrell and Mason submitted as Exhibit J and Exhibit K herein, Exhibit L. This is a violation of the 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup>, 16<sup>th</sup> Amendments, and others.



## **RELIEF**

**WHEREFORE, PREMISES CONSIDERED**, Jeanette Brown prays for a trial, and prays that the court in entirety grants compensatory damages from named Defendant, the City of Jackson, in the amount of \$50,000.00; punitive damages for defendant's willful, egregious, intentional, malicious conduct of \$50,000.00; including costs of the suit and attorney's fees; nominal damages placed against the defendant and such other judgment for further relief as the court may deem proper.

Plaintiff, Jeanette Brown demands relief against Defendant, Tony Yarber (Mayor of Jackson), in the amount of \$50,000.00 in compensatory damages; punitive damages for defendant's willful, egregious, intentional, malicious conduct of \$50,000.00; with the costs of the suit and attorney's fees; nominal damages placed against the defendant and such other and further relief as the court may deem proper.

Plaintiff, Jeanette Brown demands relief against Defendant Martha Jones-Murrell, in excess the amount of compensatory damages of \$50,000.00; punitive damages for defendant's egregious, willful, intentional, malicious conduct of \$50,000.00; with costs of the suit and attorney's fees; nominal damages placed against the defendant and such other further relief the court may deem proper.

Plaintiff, Jeanette Brown demands relief against Defendant Venecca Green-Mason (Attorney) in excess of compensatory damages of \$50,000.00; punitive damages for the defendant's willful, intentional, egregious malicious conduct of \$50,000.00; with costs of the suit and attorney's fees; nominal damages placed against the defendant and such other and further relief the court may deem proper.

Plaintiff, Jeanette Brown demands relief against the Defendant Lakeisha Heidelberg, in the amount of compensatory damages of \$50,000.00; punitive damages for the defendant's willful, egregious, intentional, malicious conduct of \$50,000.00; with costs of the suit and attorney 's fees; nominal damages placed against the defendant and such other and further relief as the court may deem proper.

Plaintiff, Jeanette D. Brown demands relief against Defendant, Rosemary Harper (JPD) in the amount of compensatory damages of \$50,000.00; punitive damages for defendants willful, egregious, intentional, and malicious conduct of \$50,000.00; with costs of the suit and attorney's fees; nominal damages placed against the defendant and such other and further relief as the court may deem proper.

Plaintiff, Jeanette Brown demands relief against Defendant Hinds County Municipal Court in the amount of compensatory damages of \$50,000.00; punitive damage damages for the defendant's willful, egregious, intentional, malicious conduct of \$50,000.00; with costs of the suit and attorney 's fees; nominal damages placed against the defendant and such other and further relief as the court may deem proper.

Plaintiff, Jeanette Brown demands relief against Defendant Johnnie McDaniel (City Prosecutor) in the amount of compensatory damages of \$50,000.00; punitive damages for the defendant's willful, intentional, egregious malicious conduct of \$50,000.00; with costs of the suit and attorney's fees; nominal damages placed against the defendant and such other and further relief as the court may deem proper.

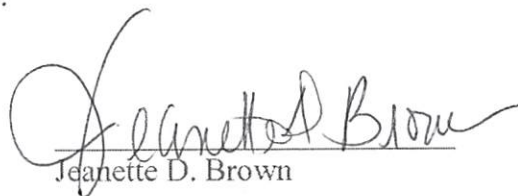
Plaintiff, Jeanette demands relief against Defendant Officer Travell Allen (JPD) in the amount of compensatory damages of \$50,000.00; punitive damages for the intentional, willful, and egregious malicious conduct of \$50,000.00; with costs of the suit and attorney's fees;

nominal damages placed against the defendant and such other and further relief as the court may deem proper.

Plaintiff, Jeanette demands relief against Defendant Ricky Williams in the amount of compensatory damages of \$50,000.00; punitive damages for the intentional, willful, and egregious malicious conduct of \$50,000.00; with costs of the suit and attorney's fees; nominal damages placed against the defendant and such other and further relief as the court

Plaintiff prays for general relief.

Respectfully submitted, this the 4th day of December 2015.

  
Jeanette D. Brown

Pro se


Jeanette D. Brown  
3 Wade Ct  
Jackson, MS. 39206  
Telephone: 601-541-1755  
Email: jeanette.d\_brown4@yahoo.com



STATE Mississippi  
COUNTY Madison

  
Jeanette Brown, Pro se

Sworn to and subscribed before me, this the 4<sup>th</sup> day of December 2015.

  
Notary Public

My commission expires: March 23<sup>rd</sup>, 2019